



February 27, 2012

Mr. David Woelfel  
California Regional Water Quality Control Board,  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, CA 92501-3348

Via US Mail and E-mail

Mayor  
Kathryn McCullough

Mayor Pro Tem  
Scott Volgs

Council Members  
Peter Herzog  
Marcia Rudolph  
Mark Tettermer

City Manager  
Robert C. Dunek

Subject: Basin Plan Amendments to Revise Recreation Standards for Inland Fresh Surface Waters in the Santa Ana Region

Dear Mr. Woelfel:

The City of Lake Forest (City) submits this comment letter to the California Regional Water Quality Control Board, Santa Ana Region (SARWQCB) in support of the adoption of the proposed Basin Plan Amendments to revise recreation standards for inland fresh surface waters in the Santa Ana Region.

The City has participated in and recognizes the efforts of the Stormwater Quality Standards Task Force, which was convened in 2003 to review the water quality standards related to swimming and recreational uses in the region's streams and rivers. Through a multi-year effort involving a wide range of stakeholders, the Task Force has evaluated the science underlying water quality criteria for bacteria, has conducted comprehensive evaluations of the ability of the region's water bodies to support swimming and other recreational uses, and has considered a wide range of potential implementation options.

The proposed Basin Plan Amendments should facilitate the protection of human health within the region while promoting the responsible expenditure of limited public resources. The Basin Plan Amendments update the region's water quality objectives for indicator bacteria to conform with the US Environmental Protection Agency's recommended criteria, and the amendments incorporate a narrative objective to assure that waste discharges do not contain human pathogens at levels that will increase the risk of illness. The proposed changes recognize that some waters are commonly used for swimming and other recreational activities, while others are used infrequently, if at all. Finally, the proposed amendments acknowledge that recreational activities are unsafe in some streams during wet weather and regulate those streams accordingly.

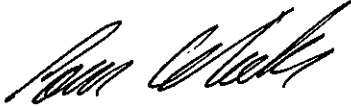


The City recognizes and appreciates the long-term participation and efforts of the SARWQCB staff with the Stormwater Quality Standards Task Force. This comprehensive effort has established a firm scientific foundation for much-needed changes to the region's Basin Plan and has done so in a manner that is open and transparent.

We appreciate your attention to our comments. If you should have any questions, please contact Devin Slaven, Water Quality Specialist, at (949) 461-3436.

Sincerely,

CITY OF LAKE FOREST



Thomas Wheeler, P.E.  
Director of Public Works/City Engineer

cc: Devin Slaven, REA, CPSWQ, Water Quality Specialist  
Dennis Jue, P.E., Deputy City Engineer  
Luis Estevez, MPA, Public Works Manager  
Chris Crompton, County of Orange, OC Public Works